

Message

From: Gerhard, Sasha [Gerhard.Sasha@epa.gov]
Sent: 6/28/2016 6:57:40 PM
To: Crosby-Vega, Terri [Crosby-Vega.Terri@epa.gov]; Abdul-Malik, Norma [Abdul-Malik.Norma@epa.gov]; Gaines, Jeff [Gaines.Jeff@epa.gov]; Galbraith, Michael [Galbraith.Michael@epa.gov]; Shuster, Kenneth [Shuster.Kenneth@epa.gov]
CC: Ning, Nina [ning.nina@epa.gov]; Berenback-Gold, Betsy [berenback-gold.betsy@epa.gov]; Thurman, Hana [thurman.hana@epa.gov]
Subject: RE: Answer to Request About Eglin Air Force Base (EAFB)

Will do, thanks!

Sasha Gerhard
USEPA, Office of Resource Conservation & Recovery
Program Implementation & Information Division, 5303P
703-347-8964 (P)
703-308-0509 (F)

From: Crosby-Vega, Terri
Sent: Monday, June 27, 2016 12:14 PM
To: Abdul-Malik, Norma <Abdul-Malik.Norma@epa.gov>; Gaines, Jeff <Gaines.Jeff@epa.gov>; Galbraith, Michael <Galbraith.Michael@epa.gov>; Gerhard, Sasha <Gerhard.Sasha@epa.gov>; Shuster, Kenneth <Shuster.Kenneth@epa.gov>
Cc: Ning, Nina <ning.nina@epa.gov>; Berenback-Gold, Betsy <berenback-gold.betsy@epa.gov>; Thurman, Hana <Thurman.Hana@epa.gov>
Subject: FW: Answer to Request About Eglin Air Force Base (EAFB)

Let's put this on the EDAT's agenda on Wed. I will be calling her later that afternoon.

Terri Crosby-Vega
Environmental Engineer
USEPA Region 4
Atlanta Federal Center 9T25
61 Forsyth Street SW
Atlanta, GA 30303
404-562-8497

From: Laura Olah [mailto:info@cswab.org]
Sent: Monday, June 27, 2016 11:25 AM
To: Crosby-Vega, Terri <Crosby-Vega.Terri@epa.gov>
Subject: RE: Answer to Request About Eglin Air Force Base (EAFB)

Wed. is perfect. Thank you!

Initially Eglin was not even on my radar, but the response from state regulators peaked my curiosity. This was punctuated when the State issued an approval letter on March 29, little more than a week after my first inquiry about OB/OD activities there.

Also, I understand that significant activities formerly in Vieques were moved to Eglin sometime after 2003. I haven't been able to find the environmental documentation for this change in operations, so I'm not sure how or if this impacted OB/OD disposal activities.

Also of note:

1. ATSDR reports DU contamination at former the High Explosives Test Area at Eglin.
2. Smoke canisters are listed as permissible OB/OD wastes in Eglin's 1995 RCRA Part B which appears inconsistent with State's response.

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Laura Olah, Executive Director
Citizens for Safe Water Around Badger (CSWAB)
Coordinator, Cease Fire Campaign
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www.facebook.com/cswab.org
<http://cswab.org/resources/cease-fire-campaign>
<http://www.facebook.com/ceasefirecampaign/>

From: Crosby-Vega, Terri [<mailto:Crosby-Vega.Terri@epa.gov>]
Sent: Friday, June 24, 2016 1:48 PM
To: Laura Olah
Subject: RE: Answer to Request About Eglin Air Force Base (EAFB)

Hi Laura,

Let's plan to meet Wed. at 1:30 EST next week. This would allow me time to review the permit and make some inquiries about associated conditions/recommendations.

Let me know if this is ok with you.

Terri

Terri Crosby-Vega
Environmental Engineer
USEPA Region 4
Atlanta Federal Center 9T25
61 Forsyth Street SW
Atlanta, GA 30303
404-562-8497

From: Laura Olah [<mailto:info@cswab.org>]
Sent: Thursday, June 23, 2016 10:44 AM

To: Crosby-Vega, Terri <Crosby-Vega.Terri@epa.gov>
Subject: FW: Answer to Request About Eglin Air Force Base (EAFB)

Received this this morning. Plus another, which I will forward in a moment. Laura

From: Stein, Camille [<mailto:Camille.Stein@dep.state.fl.us>]
Sent: Thursday, June 23, 2016 6:08 AM
To: Laura Olah
Subject: RE: Answer to Request About Eglin Air Force Base (EAFB)

Hi, Laura:

Based on your question about Eglin's burning the types about which you ask. I misunderstood your question all along and I apologize.

I hope this helps and again I apologize for my mixup.

Camille

Mrs. Camille Stein
Environmental Specialist
Florida Department of Environmental Protection
2600 Blair Stone Road, Room 329 C
Tallahassee, Florida 32399-2400
850-245-8791
Work Hours: M – F 7:00 – 3:30 EDST

From: Laura Olah [<mailto:info@cswab.org>]
Sent: Tuesday, 21 June, 2016 22:51
To: Stein, Camille <Camille.Stein@dep.state.fl.us>
Cc: Baker, Bryan <Bryan.Baker@dep.state.fl.us>
Subject: RE: Answer to Request About Eglin Air Force Base (EAFB)

Hi Camille,
I'm honestly confused. Why should I confer with the military as to the state's understanding and intent of anything? I'm merely asking the state to interpret its own approvals. As the State is apparently unable to do so, we will seek EPA's interpretation. To have to do so, however, seems more than a bit ridiculous. I hope you will re-consider your reply and answer the plain question put to your office.
Laura

From: Stein, Camille [<mailto:Camille.Stein@dep.state.fl.us>]
Sent: Tuesday, June 21, 2016 1:39 PM

To: Laura Olah
Cc: Baker, Bryan
Subject: RE: Answer to Request About Eglin Air Force Base (EAFB)

Hi, Laura:

In answer to your questions:

1. Eglin may open burn and/or open detonate small arms ammunition up to 50 caliber, chemical agent munitions, riot-control munitions, white/red phosphorous, incendiaries (for example, napalm), colored smokes, and/or depleted uranium (DU) munitions and still be in compliance with current approvals. **Please confirm that this is correct.**

Response: I cannot confirm that this is correct based on the tables that were submitted. I believe that the permit specifies what can be burned/detonated and this is based on the information supplied in the application. Neither Eglin nor I are trying to be evasive on this question. Devin Patty is the Project Manager for Eglin and I have enclosed his card if you wish to speak with him further.

2. Eglin's response is wholly complete and the open burning and/or open detonation of any of the listed wastes has not been permanently discontinued through some other formal mechanism. **Please confirm that this is correct.**

Response: Based on submittals and permits issued you are correct.

I hope this helps.

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Florida Department of Environmental Protection
2600 Blair Stone Road, Room 329 C
Tallahassee, Florida 32399-2400
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Work Hours: M – F 7:00 – 3:30 EDST

From: Laura Olah [<mailto:info@cswab.org>]
Sent: Tuesday, 21 June, 2016 14:10
To: Stein, Camille <Camille.Stein@dep.state.fl.us>
Cc: Baker, Bryan <Bryan.Baker@dep.state.fl.us>
Subject: RE: Answer to Request About Eglin Air Force Base (EAFB)

Dear Camille,

Thank you so much for your reply. The provided documents indicate the following:

1. Eglin may open burn and/or open detonate small arms ammunition up to 50 caliber, chemical agent munitions, riot-control munitions, white/red phosphorous, incendiaries (for example, napalm), colored smokes, and/or depleted uranium (DU) munitions and still be in compliance with current approvals. **Please confirm that this is correct.**
2. Eglin's response is wholly complete and the open burning and/or open detonation of any of the listed wastes has not been permanently discontinued through some other formal mechanism. **Please confirm that this is correct.**

Laura

--

Laura Olah, Executive Director
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Coordinator, Cease Fire Campaign
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<http://www.facebook.com/ceasefirecampaign/>

From: Stein, Camille [<mailto:Camille.Stein@dep.state.fl.us>]
Sent: Monday, June 20, 2016 2:06 PM
To: Laura Olah
Cc: Baker, Bryan
Subject: RE: Answer to Request About Eglin Air Force Base (EAFB)

Hi, Laura:

Bryan Baker requested that I respond to you. Here are your unanswered questions and my responses. I also requested that my contact at Eglin provide information.

As you indicated on the phone, there is no specified annual limit by weight (NEW) for Eglin OB/OD activities. However, you noted that the 2001 application indicates that open burning activities are limited to 4 times per day and only during daylight hours. The document does not specify that this same limit pertains to detonations. However, if detonations would occur on a similar rate as burning (ie four events/day maximum), the CALCULATED maximum annual threshold NEW for OB/OD operations is 8,760,000 pounds (365 days/year x 4 events/day x 2 facilities x 3,000 pounds/event). **Please advise if this is NOT correct.**

Response: Based on your calculations this is correct.

As we discussed, I do recognize that ACTUAL annual OB/OD activities may be considerably less, as indicated in the table you provided. In this case, the difference is significant – for the last 5 years, actuals are approximately 700 times less

than the currently allowed calculated threshold at Eglin. This suggests that an adjustment in permit conditions should be considered, including a formal review of alternatives to OB/OD.

Response: Our permit is based on a facility's complete and technically adequate permit application. We do not adjust permit conditions unless a change in the application warrants a modification. It would be up to Eglin to propose alternatives to OB/OD.

Along those same lines, I am unable to find a list of prohibited wastes in the documents provided. OB/OD of certain energetic wastes is normally prohibited due to the potential for toxic releases or due to the availability of alternative treatment technologies. Prohibited items normally include:

....

Response: Attached is the response that I received from my contact at Eglin.

I hope that this helps.

Thanks,

Camille Stein

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From: Baker, Bryan
Sent: Friday, 10 June, 2016 11:59
To: Laura Olah <info@cswab.org>
Cc: Stein, Camille <Camille.Stein@dep.state.fl.us>
Subject: RE: Answer to Request About Eglin Air Force Base (EAFB)

Camille, please work on a response. You may discuss with Tim while I'm out.

Bryan Baker, P.G.
Environmental Administrator
Hazardous Waste Program & Permitting
2600 Blair Stone Rd MS 4560

Florida Department of Environmental Protection

Tallahassee, FL 32399

850-245-8787

bryan.baker@dep.state.fl.us

Please note: Florida has a broad public records law. Most written communications to or from state employees are public records and may be made available to the public or media upon request. This email communication, and future emails to my attention may therefore be subject to public disclosure.

From: Laura Olah [<mailto:info@cswab.org>]

Sent: Friday, June 10, 2016 11:36 AM

To: Baker, Bryan <Bryan.Baker@dep.state.fl.us>

Cc: Stein, Camille <Camille.Stein@dep.state.fl.us>

Subject: RE: Answer to Request About Eglin Air Force Base (EAFB)

If possible, an answer sooner would be great. Laura

Laura Olah, Executive Director

Citizens for Safe Water Around Badger (CSWAB)

Coordinator, Cease Fire Campaign

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<http://cswab.org/resources/cease-fire-campaign>

<http://www.facebook.com/ceasefirecampaign/>

From: Baker, Bryan [<mailto:Bryan.Baker@dep.state.fl.us>]

Sent: Friday, June 10, 2016 10:10 AM

To: Laura Olah

Cc: Stein, Camille

Subject: RE: Answer to Request About Eglin Air Force Base (EAFB)

Laura, sorry, I haven't gotten to this yet and I'm going to be out for 2 weeks. I'm going to ask Camille to take a look at your questions while I'm out. If this is something that can wait, please let us know and I'll address when I return. Thanks, Bryan

Bryan Baker, P.G.

Environmental Administrator

Hazardous Waste Program & Permitting

2600 Blair Stone Rd MS 4560

Florida Department of Environmental Protection

Tallahassee, FL 32399

850-245-8787

bryan.baker@dep.state.fl.us

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From: Laura Olah [<mailto:info@cswab.org>]

Sent: Friday, June 03, 2016 5:00 PM

To: Baker, Bryan <Bryan.Baker@dep.state.fl.us>; Stein, Camille <Camille.Stein@dep.state.fl.us>

Cc: Bahr, Tim <Tim.Bahr@dep.state.fl.us>

Subject: RE: Answer to Request About Eglin Air Force Base (EAFB)

Dear Bryan,

Thank you for the additional information and the 2001 Subpart X application for Eglin Air Force Base with the four events/day reference.

As you indicated on the phone, there is no specified annual limit by weight (NEW) for Elgin OB/OD activities. However, you noted that the 2001 application indicates that open burning activities are limited to 4 times per day and only during daylight hours. The document does not specify that this same limit pertains to detonations. However, if detonations would occur on a similar rate as burning (ie four events/day maximum), the CALCULATED maximum annual threshold NEW for OB/OD operations is 8,760,000 pounds (365 days/year x 4 events/day x 2 facilities x 3,000 pounds/event). **Please advise if this is NOT correct.**

As we discussed, I do recognize that ACTUAL annual OB/OD activities may be considerably less, as indicated in the table you provided. In this case, the difference is significant – for the last 5 years, actuals are approximately 700 times less than the currently allowed calculated threshold at Eglin. This suggests that an adjustment in permit conditions should be considered, including a formal review of alternatives to OB/OD.

Along those same lines, I am unable to find a list of prohibited wastes in the documents provided. OB/OD of certain energetic wastes is normally prohibited due to the potential for toxic releases or due to the availability of alternative treatment technologies. Prohibited items normally include:

- Small arms ammunition (since this is not considered to have RCRA explosive reactivity characteristics based on EPA policy, and alternative treatment technologies are available)
- Chemical agent munitions
- Riot-control munitions
- White/red phosphorous
- Incendiaries (such as napalm)
- Colored smokes
- Depleted uranium (DU) munitions

(Reference: https://www3.epa.gov/reg3wcmd/ca/pdf/RCRA_OpenBurnOpenDet_Guide.pdf)

QUESTION: What specific wastes are prohibited for OB/OD at Eglin? Please provide a copy of the source document where this is specified.

Thank you.

Laura

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Laura Olah, Executive Director
Citizens for Safe Water Around Badger (CSWAB)
Coordinator, Cease Fire Campaign
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www.facebook.com/cswab.org
<http://cswab.org/resources/cease-fire-campaign>

From: Baker, Bryan [<mailto:Bryan.Baker@dep.state.fl.us>]

Sent: Friday, June 03, 2016 2:07 PM

To: Laura Olah; Stein, Camille

ED_001691B_00002696

Cc: 'mailto:Tim.Bahr@dep.state.fl.us'; PATTY, DEVIN C GS-12 USAF AFMC 96 CEG/CEIEC (devin.patty@us.af.mil)
Subject: RE: Answer to Request About Eglin Air Force Base (EAFB)

Hi Laura,

A pleasure speaking with you today. Attached is the 2001 permit application we discussed and below are the last 5 years of data from Eglin AFB. Note, it's very common for a facility to refer to past permit applications, rather than generate new ones that say the same thing. So, referencing back to 2001 is pretty normal. Please contact me if you have any further questions, Bryan

Eglin AFB Ammunition Disposal

		N.E.W. (lbs)
2011		
14-Mar		5561
23-May		5433
19-Sep		4892
5-Dec		1597
2012		
13-Feb		2721
7-May		2959
13-Aug		3650
19-Nov		3781
2013		
18-Mar		12671
24-Jun		3879
23-Sep		2368
16-Dec		1595
2014		
24-Mar		2135
23-Jun		1875
29-Sep		4004
8-Dec		1898
2015		
23-Feb		2078
11-May		4044
28-Sep		3810
7-Dec		1212

Bryan Baker, P.G.
Environmental Administrator
Hazardous Waste Program & Permitting
2600 Blair Stone Rd MS 4560
Florida Department of Environmental Protection
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From: Laura Olah [<mailto:info@cswab.org>]

Sent: Thursday, May 26, 2016 4:29 PM

To: Stein, Camille <Camille.Stein@dep.state.fl.us>

Cc: Russell, Merlin <Merlin.Russell@dep.state.fl.us>; 'mailto:Tim.Bahr@dep.state.fl.us'; Baker, Bryan <Bryan.Baker@dep.state.fl.us>

Subject: RE: Answer to Request About Eglin Air Force Base (EAFB)

Dear Camille,

Thank you for sending application and approval letter for Elgin's OB/OD activities and the email from the facility. Unfortunately, this information does not answer my original question which pertains to permit and/or application conditions.

Q: Is there is an **ANNUAL limit** on the total pounds of NEW that may be treated by OB/OD at Elgin?

The only limitations I can find on OB/OD activities at Elgin are the following.

FOR OPEN BURNING:

"The maximum inventory of hazardous waste at the OB/OD units is based on the allowable range limitation on the net explosive weight (NEW) of unserviceable munitions. The maximum amount of unserviceable munitions accommodated by the OB/OD units at one time is 3,000 pounds NEW per OB/OD event." SOURCE: Application, Section II F1.3.

Limits on open burning: "Daylight Hours" and 3,000 pounds NEW per event.

FOR OPEN DETONATION:

"The Permittee is allowed to thermally treat by Open Detonation (OD) military munitions at a designated location on Range C-52 North and Range C-62 described in the permit application. The hazardous waste can be generated from sources outlined in the permit application." (Source: Permit page 23 of 53, Item 8.)

"The Net Explosive Weight (NEW) treated by OD operation shall not exceed that outlined in the permit application. One OD event may include multiple detonations, with each detonation limited to 3,000 pounds combined NEW or less and detonations staggered by at least 10 minutes." (Source: Permit page 23 of 53, Item 10.)

POTENTIAL ALLOWABLE OB/OD ACTIVITY BASED ON ABOVE CONDITIONS:

If OB and OD activities are conducted 365 days/year x 10 events per day (once per hour x 10 average daylight hours/day) x 2 facilities x 3,000 pounds/event, Elgin would be compliant with its current permit conditions if it treated 21,900,000 pounds NEW annually.

Laura

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Laura Olah, Executive Director
Citizens for Safe Water Around Badger (CSWAB)
Coordinator, Cease Fire Campaign
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www.facebook.com/cswab.org

From: Laura Olah [<mailto:info@cswab.org>]
Sent: Monday, May 16, 2016 7:13 PM
To: info@cswab.org
Subject: FW: Answer to Request About Eglin Air Force Base (EAFB)

From: Stein, Camille [<mailto:Camille.Stein@dep.state.fl.us>]
Sent: Wednesday, March 30, 2016 1:42 PM
To: Laura Olah
Subject: RE: Answer to Request About Eglin Air Force Base (EAFB)

Hello again:

This is the most recent permit we issued. If you go to Page 2 of 53, paragraphs 3 through 5 contain information about the actual units. Part II Subpart B (Specific Operating Conditions), Condition 10 (Page 23 of 53) discusses the amount of material that can be detonated.

The initial application from May of 1995 is also attached. Page No. II.B.2, the first paragraph describes the explosives that Eglin detonates. You'll need to scroll down awhile and look at the top for the page number.

If you need any additional information please let me know.

Thanks,

Camille

Mrs. Camille Stein
Environmental Specialist
Florida Department of Environmental Protection
MS 4560
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Direct Line: 850-245-8791

From: Laura Olah [<mailto:info@cswab.org>]

Sent: Wednesday, March 30, 2016 13:25

To: Stein, Camille <>

Cc: Bahr, Tim <Tim.Bahr@dep.state.fl.us>; Russell, Merlin <Merlin.Russell@dep.state.fl.us>; Baker, Bryan <Bryan.Baker@dep.state.fl.us>; info@cswab.org

Subject: RE: Answer to Request About Eglin Air Force Base (EAFB)

Thank you for the information and for your assistance, Camille.

You could provide me with a copy of the application and/or permits that contain the conditions of operation which are outlined in the facility's reply?

Laura

--

Laura Olah, Executive Director

Citizens for Safe Water Around Badger (CSWAB)

Coordinator, Cease Fire Campaign

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<http://cswab.org/resources/cease-fire-campaign>

From: Stein, Camille [<mailto:Camille.Stein@dep.state.fl.us>]

Sent: Monday, March 28, 2016 8:36 AM

To: info@cswab.org

Cc: Bahr, Tim; Russell, Merlin; Baker, Bryan

Subject: Answer to Request About Eglin Air Force Base (EAFB)

Good morning, Laura:

I just got off the telephone with Eglin's Project Manager, Devin Patty.

According to him:

The maximum amount of explosive is 3,000 pounds Net Explosive Weight. The detonation is conducted four times a year.

The only munitions that Eglin will accept is anything that has a Military Munition Stock Number List and any Research and Development explosive(s) from its High Explosive Research Division.

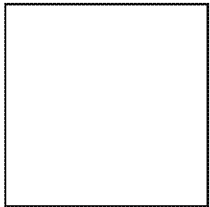
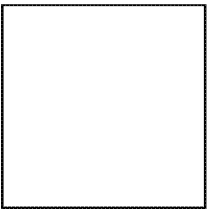
Please let me know what other information you require.

Thank you,

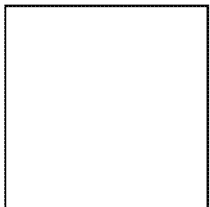
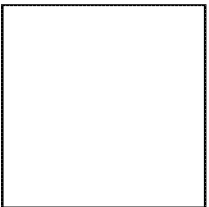
Camille Stein

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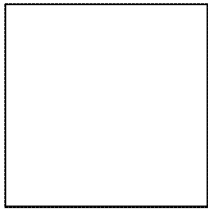
Direct Line: 850-245-8791



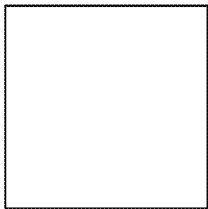
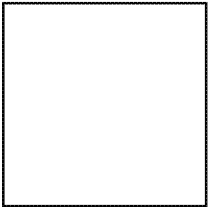
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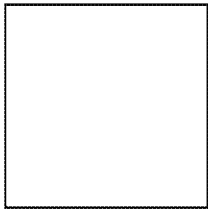
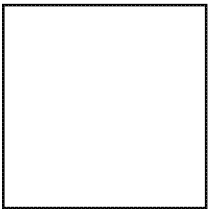
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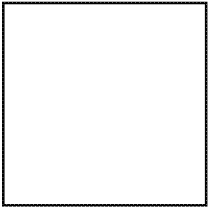
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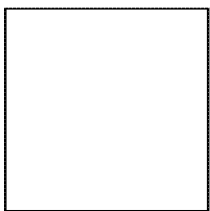
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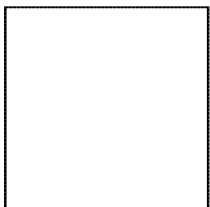
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